

Monsanto

PERSONAL & CONFIDENTIALFROM M. E. Whelan - WCK
NAME-LOCATION-PHONEDATE March 2, 1983
SUBJECT Chlorophenol Decontaminationcc D. Edwards - B2SE
B. Fay
D. Lynch.

REFERENCE

TO F. Matthews
E. Stewart

As a part of the decontamination of the Chlorophenol equipment, we will be developing wash procedures to remove the residual material. The question at hand is how clean is clean or must clean be? I propose that the final rinse water be analyzed for total chlorophenol content and the equipment be declared clean if the rinse water has less than 50 PPM chlorophenols. This is the same level used for PCB's for legal contamination determination. This level will also insure any trace impurities are well below current detection method limits. Our current wash practices should be sufficient to meet this criterion. We will be running some plant tests to verify that this level is achievable. We do plan to use caustic, if necessary, to effectively clean the equipment.

The current plans called for a controlled scrap of all equipment unless an approved alternate use is identified. Railcars will either be scrapped, returned to the lease company or placed in alternate service. We do not anticipate restricting use of this equipment from anything but food grade service.

This wash level is a key to our cleaning plan and will be the level we establish unless otherwise directed.

M. E. Whelan
M. E. Whelan

/bb

MCO 8769920

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MCB-233

FROM: NAME-LOCATION-PHONE: D. J. Kalota - Q2E

DATE:	November 23, 1982	cc:	D. K. Lynch	- 1740
			J. W. Mottern	- Q2E
SUBJECT:	EPA's FINAL RULE ON PCB's IN 'CLOSED AND CONTROLLED WASTE MANUFACTURING PROCESSES'		J. C. Peduzzi	- 1740
REFERENCE:			W. R. Richard	- R4B
TO:	Federal Register, Vol 47 (No. 204), October 21, 1982			

D. H. Bolliger - R4B

The final EPA rule regulating PCB's in closed and controlled waste manufacturing processes has, 1) set limit of quantitation (LOQ) for PCB's in product or waste at 2 ppm/GC peak, 2) increased the number of acceptable waste disposal mechanisms, 3) instituted new record-keeping and reporting requirements.

Processes that qualify as closed or controlled waste facilities are excluded from the TSCA section 6(e) ban. By my interpretation, the chlorobenzene process at WGK does qualify for the exclusion with respect to products and wastes from stills. We now know that all distilled products and PDCB from these processes contain less than the EPA established cutoff of 2 ppm/peak. Also, the waste residues that contain >50 ppm PCB's are handled in accordance with the existing PCB disposal and marking rule (43FR7150). The HCl carbon is still being evaluated. Analysis of carbon samples indicates that they do contain PCB's. The EPA rule permits disposal in a qualified incinerator or in an EPA approved PCB landfill waste containing PCB's between the LOQ and 50 ppm.

To qualify for the exclusion, the following recordkeeping and reporting requirements must be met:

1. Certify that the process qualifies.
2. Notify the EPA of the certification and how they made the determination.
3. Maintain a record of the determination that the process qualifies for exclusion.

The EPA's preferred analytical method is the capillary gas chromatography/electron impact mass spectrometer (CGC/EIMS). The GC/MS method that was used in our recent study of the process was equivalent to the EPA method but used a packed column instead of a capillary column.

MCD 8769921

D. J. Kalota
D. J. Kalota

115 Re your memo to FBM + FES
2/2/83 - note the lower PCB limit.
OK Lynch